

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE WESTERN DISTRICT OF OKLAHOMA**

3 ISABELA SNEED,)
4 Plaintiff,)
5 vs.) Case No. 22-cv-00031-R
6 INDEPENDENT SCHOOL)
7 DISTRICT NO. 16 OF)
8 PAYNE COUNTY,)
9 Defendant.)

10
11 **DEPOSITION OF**
12 **JOHN FIELDS**

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19 DATE: FEBRUARY 28, 2023

20 REPORTER: MARISA SPALDING, CSR, RPR

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22
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EXHIBIT

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A P P E A R A N C E S:

FOR THE PLAINTIFF:

SMOLEN & ROYTMAN, P.L.L.C.
701 South Cincinnati Avenue
Tulsa, Oklahoma 74119
BY: MR. DANIEL E. SMOLEN

FOR THE DEFENDANT:

ROSENSTEIN, FIST & RINGOLD
525 South Main Street, Suite 700
Tulsa, Oklahoma 74103
BY: MR. JOHN E. PRIDDY

ALSO PRESENT: John Corley
Matt Lamkin

DEPOSITION OF **JOHN FIELDS**, produced as a
witness duly sworn by me, taken in the
above-styled and numbered cause on the 28th
day of February, 2023, at 10:06 a.m.,
before **MARISA SPALDING**, Certified Shorthand
Reporter No. 01750 in and for the State of
Oklahoma, at Best Western Plus Cimarron
Hotel & Suites, 315 North Husband Street,
Stillwater, Oklahoma, in accordance with
the agreement hereinafter set forth.

A G R E E M E N T S

It is hereby agreed by and between the parties hereto, through their respective attorneys appearing herein, that the Plaintiff may take the deposition of **JOHN FIELDS** at this time, that said deposition is being taken by Subpoena and said deposition is being taken with the same force and effect as though all the requirements of the Rules and Statutes had been fully complied with.

It is further agreed by and between the parties hereto, through their attorneys appearing herein, that any and all objections to any question, except as to form contained herein, may be made upon the offering of this deposition in evidence upon the trial of this cause with the same force and effect as though the witness were present in person and testifying from the witness stand.

It is further agreed by and between the parties hereto, through their attorneys appearing herein, that this deposition may be signed before any Notary Public and

1 thereafter returned into Court and used
2 upon the trial of this cause with the same
3 force and effect as though all requirements
4 of the Rules and Statutes with reference to
5 signature and return had been fully
6 complied with.

7 It is further agreed by and between the
8 parties hereto, through their attorneys
9 appearing herein, that if the original of
10 this deposition has not been properly
11 signed before any officer authorized to
12 administer oaths within (30) days after its
13 submission to said witness and thereafter
14 returned to the attorney who asked the
15 first question appearing in the transcript
16 prior to any contested hearing in this
17 cause, that an unsigned, certified copy may
18 be substituted and used for all purposes,
19 the same as though the original had been
20 signed by said witness and properly
21 returned.

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1 P R O C E E D I N G S

2 JOHN FIELDS,

3 A witness hereinbefore named, being of
4 lawful age and being first duly cautioned
5 and sworn in the above cause, testified on
6 his oath as follows:

7 DIRECT EXAMINATION

8 BY MR. SMOLEN:

9 Q Sir, could you please state your
10 full name for the record?

11 A My name is John Lawrence Fields, Jr.

12 Q Okay. And, Mr. Fields, you and I
13 just met just briefly this morning when I
14 walked into the motel. I saw you sitting
15 there and introduced myself, right?

16 A That's correct.

17 Q That's the first time that you've
18 had any kind of communication with me --

19 A Yes.

20 Q -- is that fair? Okay. Just by way
21 of background, have you ever had a
22 deposition before?

23 A I have.

24 Q Okay. When was that?

25 A Oh, 20 years ago.

1 where do you believe, based on your
2 recollection -- I understand that, you
3 know, it's a little fuzzy at this point.
4 Where do you believe you were working for
5 the school district in 2017/2018?

6 A I believe I was at Stillwater Junior
7 High School. And at that point, I believe,
8 I was the principal.

9 Q Okay. I know that you had stepped
10 into that role recently. Who -- did
11 someone backfill the assistant principal
12 position?

13 A Yes. When I assumed that position,
14 I had two assistant principals. One was
15 Brian Warwick, who's now the athletic
16 director for the district, and one was
17 George Horton, who's now an assistant
18 principal at Stillwater High School.

19 Q Okay. Okay. And then in the second
20 paragraph, there's a reference to Alberto
21 Morejon as being a history teacher at the
22 Stillwater Junior High School. Do you
23 remember that particular faculty member?

24 A Yes, I do.

25 Q Am I pronouncing the name right?

1 A Morejon, that's correct.

2 Q And do you know how long Alberto
3 Morejon had worked as a teacher at the
4 Stillwater Junior High School?

5 A I believe -- I -- I -- I cannot
6 remember if Dr. Baker was involved in his
7 hiring or if I was involved.

8 Q Okay.

9 A Although I do know that I was on the
10 committee that interviewed him.

11 Q For his initial position?

12 A For his initial position, yes. That
13 -- the initial part of that takes place
14 with an administrator. It could be either
15 one of the three. And the staff members,
16 particularly people that are in the
17 department, where we're seeking to fill a
18 position.

19 Q Okay.

20 A So I know that I was involved in his
21 early employment, but I can't remember if I
22 was assistant or if that was Dr. Baker
23 so...

24 Q Fair enough, and I appreciate that.
25 Do you recall -- I mean, other than sitting

1 on the board that ultimately interviewed
2 him and offered him a position with the
3 school district, do you recall anything
4 else about those interviews that you find
5 to be significant in any way?

6 Or, for example, were there any issues
7 that you guys identified that you had found
8 to be problematic or alternatively -- or
9 the things that you found to be really
10 positive about Mr. Morejon's application
11 and why you wanted him to be a member of
12 the faculty?

13 A I will tell you quite honestly that
14 was five years ago, six years ago,
15 something of that nature. I remember
16 having a positive view of the candidate at
17 that time. And I'll -- I want to make a
18 point here so that you know that the
19 committee that interviews him is solely to
20 interview him. We make a recommendation to
21 the school board and the school board hires
22 him. We don't.

23 Q Okay.

24 A I don't have that authority. I
25 don't have the authority to hire him or

1 fire him.

2 Q Okay.

3 A But certainly, what happens
4 sometimes is there are two or three
5 candidates and we pass those candidates on.
6 We say, we like both these people. You
7 pick. I believe in his case, the people
8 that he was going to work with found him to
9 be somebody they thought would fit in well
10 with our staff, and I think we were all
11 enthusiastic about him at the time.

12 Q Okay.

13 A And I know we recommended him to the
14 school board to be hired.

15 Q Were there other people that you
16 believe that were interviewed that were
17 also recommended to the school board?

18 A No, I believe he was our sole
19 candidate --

20 Q Okay.

21 A -- that we recommended at that time.

22 Q Okay. During the time that you
23 served as the principal of the junior high,
24 okay, do you ever recall any issues at all
25 -- any kind of issues pertaining to Morejon

1 being raised to your attention?

2 A No, I do not.

3 Q What was the structure that was in
4 place at the Stillwater Junior High School
5 as it pertained to if someone had an issue
6 with a teacher, any kind of issue? Was
7 there a mechanism in place that a student
8 could then report that?

9 A Well, I would say to you that --
10 that could happen several ways.

11 Q Okay.

12 A And I don't believe that there is
13 anything printed in the student code of
14 conduct or Stillwater's handbook that says
15 if you're a student, take step A, then B,
16 then C, then D, which might be nice for
17 kids, you know, to say if they have a --
18 but I believe that process wise there at
19 the junior high, we were always very clear
20 to students when we had student meetings,
21 introductory meetings with each grade.

22 And we saw each class separately. The
23 guidance counselors -- we made them aware
24 that if you're having an issue with really
25 anything, one of your first steps should be